

U.S. BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

IN RE: Veronica Lorraine Martin

Chapter 13  
Case No. 23-61083

Debtor(s)

**APPLICATION TO QUASH GARNISHMENT**

COMES NOW the Applicant(s), by counsel, pursuant to Bankruptcy Code § 362(a), and states as follows:

1. Applicant(s) has filed a petition for relief under Chapter 13 of Title 11 of the United States Code.

2. Applicant Veronica Martin is subject to a garnishment issued by the Orange General District Court, 110 North Madison Road, Suite 100, Orange, VA 22960, and returnable after the filing of the above-named petition.

3. The garnishment issued by the Orange General District Court is in favor of Susana Pellegrino, 202 Dundee Place, Fredericksburg, VA 22405, and has a return date of 1/24/2024, and the Garnishee is Flow Subaru of Charlottesville, 500 W 5th St., Ste 1800, Winston Salem, NC 27101.

WHEREFORE, Applicant(s) prays that said garnishment be quashed and that she have such other and further relief as the nature of this case may require.

Respectfully submitted,

VERONICA LORRAINE MARTIN

By counsel

/s/ Jennifer M. Wagoner

Jennifer M. Wagoner  
Slayton Law, PLC  
913 East Jefferson Street  
Charlottesville, VA 22902  
(434) 979-7900  
Counsel for Applicant(s)

**CERTIFICATE OF SERVICE**

I, attorney for the Debtor(s), hereby certify that a copy of the foregoing Application to Quash Garnishment has been served upon Susana Pellegrino, Flow Subaru of Charlottesville, Orange General District Court, and the Debtor(s), by first-class mail on 10/2/2023 .

/s/ Jennifer M. Wagoner  
Jennifer M. Wagoner



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October 2, 2023

Court Clerk, Orange General District Court  
ATTN Garnishments  
110 North Madison Road  
Suite 100  
Orange, VA 22960

Susana Pellegrino  
202 Dundee Place  
Fredericksburg, VA 22405

Susana Pellegrino  
c/o Harry T. Richard, Esq.  
105 Elm Avenue, PO Box 2141  
Louisa, VA 23093

GARNISHEE

Flow Subaru of Charlottesville  
500 W 5th St  
Ste 1800  
Winston Salem, NC 27101

Re: Our Bankruptcy Client(s):  
Veronica Lorraine Martin  
Chapter 13 Case Number 23-61083  
*Susana Pellegrino v. Veronica Martin*, GV23000538-01  
Return Date 1/24/2024

Ladies and Gentlemen:

We represent Veronica Lorraine Martin in a Chapter 13 bankruptcy filed on October 2, 2023 in the Western District of Virginia under Case No. 23-61083. Veronica Lorraine Martin's wages are being garnished by Susana Pellegrino.

Enclosed is an Application to Quash Garnishment. You will be receiving the Order stopping the garnishment shortly. Pursuant to bankruptcy law, you are hereby advised that:

1. This garnishment must be dismissed by Susana Pellegrino immediately, with written confirmation to my office.
2. All garnished funds being held by Orange General District Court should be returned to my office.
3. All garnished funds being held by Flow Subaru of Charlottesville should be returned to my office, and all deductions from my client's wages should cease immediately.
4. All garnished funds that have been disbursed to Susana Pellegrino should be returned to my office.

If we do not receive these funds within 30 days of the date of this letter, we will ask the Bankruptcy Court and/or the Bankruptcy Trustee to take action, and you may be liable for fees and costs.

Sincerely,

Jennifer M. Wagoner

JMW/cm

Enclosure

cc: Veronica Lorraine Martin  
US Bankruptcy Ct Clerk (via ECF)